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SHAWNEE MISSION

MEDICAL CENTER

FEB 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FEB 24 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FCC MAIL

1. The act will result in undue hardship and tremendous monetary cost to existing Part 90 radio spectrum users. If Part 88 "spectrum refarming" rules are adopted, our institution alone would have to attempt to replace \$50,000.00 to \$100,000.00 worth of perfectly functioning radio communications equipment.

2. There is no certainty and no guarantee that the expensive replacement radio equipment and services would match the quality and the coverage of our existing and in-place radio communications systems. To the contrary; preliminary information on tests of narrow bandwidth communications concepts (such as amplitude ~~compressed single-sideband or ACSSB) point to voice recognition~~

5. We have concerns about possible consolidation of various radio service categories. The existing radio service categories have evolved over a period of many years and serve very legitimate

9. We question the disaster and emergency preparedness implications of concentrating large volumes of users onto heavily computerized single-sight or multiple-sight SMR systems. Independently owned and operated radio systems are apt to be less vulnerable to serious outages due to geographic separation and diversity.

10. We believe that the Part 88 "spectrum refarming" rules would very negatively impact the existing two-way radio communications businesses; reducing competition to just a few of the biggest manufacturers and unnecessarily driving-up costs for the end users, such as ourselves.

We wish to thank the Commission for the opportunity to file comments in this Notice of Proposed Rulemaking.

Respectfully submitted,
Shawnee Mission Medical Center
February 23, 1993

Richard J. McChesley